

Remarks

The specification has been amended in accordance with the Examiner suggestions to overcome objections to the drawings and element ID numerals, and withdrawal of the objections is earnestly requested.

The previously elected claims 15, 17 and 18 were rejected for anticipation and/or obviousness based on the Trueba reference and the Te reference, as well as the prior art description in the specification. The earlier filing date for the Te reference was also the basis for an improper inventorship rejection. These rejections are respectively traversed, and favorable reconsideration is earnestly solicited.

In order to clarify and emphasize features in the present invention that distinguish the cited references, rejected claims 15, 17 and 18 have been canceled without prejudice and new claims 19-33 have been added by amendment. In that regard the new claims when considered in conjunction with the exemplary drawing of Fig. 4 are clearly new, non-obvious and patentable over the two cited references and the background prior art cited in the present specification.

There is no teaching or disclosure in the Examiner's citations of a glass substrate forming raised features such as spaced-apart pillars, with a metallic layer above the substrate as well as above the raised features, with both portions of such metallic layer connected together. The Te reference teaches in the opposite direction by deliberately separating its two metal layer portions.

The cited Fig. 1 drawings and related prior art description in Trueba is also not pertinent because there is no disclosure of a pillar-like feature that conforms in size and shape to a nozzle orifice to be electroformed thereon. The deficiency of this prior art technique is also described in the present application background section as follows: "The orifice size is determined by

carefully controlling the electroplating parameters (current, timing, ant the like) for forming an orifice plate on the mandrel. Therefore, a variation in these parameters will directly affect the size of the orifices.” (Page 3 at lines 1-3 of present specification). In contrast the configuration of the actual mandrel surface itself is the determining factor in the present invention for creating the desired size, shape and position of a printhead nozzle plate.

Accordingly, the unique features of new independent claims 19 and 32 and their respective dependent claims 20-31 and 33-35 are deemed to be both novel and non-obvious over the cited prior art, and favorable reconsideration and formal allowance is respectfully requested.

Respectfully submitted,



David S. Romney
Registration No. 24,266
Attorney for Applicants
Telephone: (801) 478-0071

Dated: 18 December 2003